

REESE LLP

Via CM/ECF

Honorable Ronnie Abrams
United States District Judge
for the Southern District of New York
40 Foley Square
New York, New York 10007

Re: Rivera et. al v. SC Johnson & Son, Inc.
Case No. 20-cv-03588-RA

December 8, 2021

The stay in this case is continued to January 10, 2022
By no later than that date, the parties shall update the
Court on the *Clark* settlement and the ongoing need
for a stay in this action.
SO ORDERED.



Hon. Ronnie Abrams
December 9, 2021

Dear Judge Abrams –

I, along with co-counsel, represent the plaintiffs in the above-referenced action. I make this submission in response to the three questions raised in Your Honor's Order dated November 18, 2021 (ECF No. 47). I make this submission with the consent of opposing counsel (David F. McDowell of Morrison & Foerster LLP) who has reviewed this letter and agrees to its content.

Question 1: whether the Clark settlement has been approved and the prospect of any appeal of such approval.

Response to Question 1:

A hearing on the motion seeking final approval of the Clark settlement was held yesterday, December 7, 2021. Objections to the settlement were raised by certain class members during the hearing. The court tentatively ruled that it would grant final approval of the settlement, but no final order has been issued yet on the motion for final approval in that matter.

Question 2: which individual Plaintiffs in the instant case have opted out of that settlement;

Response to Question 2:

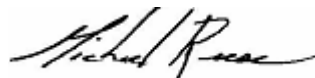
All the named plaintiffs in the above-referenced action opted out of the Clark settlement.

Question 3: The ongoing need for a stay in this action.

Response to Question 3:

The Parties propose that the stay be continued until January 10, 2022. At that time, the Parties will apprise the Court of the status of the settlement approval in the Clark matter.

Respectfully submitted,



cc: All counsel of record, via CM/ECF

Michael R. Reese

100 West 93rd Street • Sixteenth Floor • New York, New York 10025

www.reesellp.com • Telephone: (212) 643-0500 • Facsimile: (212) 253-4272